

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RASHAD DEBOSE,

Plaintiff,

vs.

DUN & BRADSTREET HOLDINGS, INC.,

Defendant.

Case No: 2:22-cv-00209-ES-JRA

Hon. Esther Salas, U.S.D.J.

Hon. José R. Almonte, U.S.M.J.

**STIPULATION AND CONSENT ORDER
EXTENDING THE BRIEFING SCHEDULE
ON SUPPLEMENTAL BRIEFING**

THIS MATTER having been brought before the Court by application of Defendant Dun & Bradstreet Holdings, Inc. (“D&B”) and Plaintiff Rashad Debose (“Plaintiff” and collectively with D&B as the “Parties”), by and through their counsel, for the entry of a Stipulation and Consent Order extending the briefing schedule set by the Court with respect to the requested supplemental briefing. See ECF No. 52. Defendant having provided his consent, it is hereby stipulated and agreed:

1. On January 17, 2022, Plaintiff filed his Complaint in the United States District Court for the District of New Jersey (ECF No. 1).
2. On March 30, 2022, D&B filed its Motion to Dismiss Plaintiff’s Complaint (ECF No. 9).
3. On May 2, 2022, Plaintiff filed his opposition to D&B’s Motion to Dismiss (ECF No. 18).
4. On May 23, 2022, D&B filed its reply in further support of its Motion to Dismiss (ECF No. 29).
5. On November 23, 2022, the Court requested supplemental briefing on the First Amendment issues raised by Defendant in its reply and ordered the Clerk of the Court to

administratively terminate D&B's Motion to Dismiss for docket management purposes . ECF No. 52. The Court set Plaintiff's brief due on December 14, 2022, and Defendant's brief due on December 21, 2022.

6. Given simultaneous and substantial deadlines in other cases for both Parties and the Thanksgiving and winter holidays, the Parties agree to extend the briefing schedule.

7. Plaintiff shall file his supplemental brief by January 6, 2023.

8. Defendant shall file its supplemental brief by January 20, 2023.

9. The Parties will limit their supplemental briefs to 25 pages.

10. This application is being made to the Court prior to the date on which the Parties are required to submit their supplemental briefs.

WHEREAS the Parties having consented to the substance and entry of this Order; and for good cause having been shown for the entry of this Order;

IT IS on this 1st day of December, 2022;

ORDERED that the time in which Plaintiff shall file its 25-page supplemental brief **BE AND IS HEREBY IS** extended up to and including January 6, 2023, and the time in which Defendant shall file its 25-page supplemental brief **BE AND HEREBY IS** extended up to and including January 20, 2023.



HON. ESTHER SALAS, U.S.D.J.

The undersigned hereby consent to the form and entry of the within Order.

/s/James A Barry
James A. Barry
POGUST GOODHEAD, LLC

/s/Michael R. O'Donnell
Michael R. O'Donnell
RIKER DANZIG SCHERER HYLAND

505 S. Lenola Rd., Suite 126
Moorestown, NJ 08057
Telephone: (610) 941-4204
Facsimile: (610) 941-4245
jbarry@pogustgoodhead.com

Raina Borrelli
Brittany Resch
TURKE & STRAUSS LLP
613 Williamson St., Suite 201
Madison, Wisconsin 53703-3515
Telephone: (608)237-1775
Facsimile: (608)509-4423
raina@turkestrauss.com
brittanyr@turkestrauss.com

Benjamin R. Osborn (to be admitted Pro Hac Vice)
102 Bergen St. Brooklyn, NY 11201
Telephone: (347) 645-0464
ben@benosbornlaw.com

Michael F. Ram (to be admitted Pro Hac Vice)
mram@forthepeople.com
MORGAN & MORGAN
COMPLEX LITIGATION GROUP
711 Van Ness Avenue, Suite 500
San Francisco, CA 94102
Telephone: (415) 358-6913
Facsimile: (415) 358-6923

Counsel for Plaintiff

Dated: November 30, 2022

& PERRETTI LLP
Headquarters Plaza
One Speedwell Avenue
Morristown, NJ 07962
Telephone: (973) 451-8476
Facsimile: (973)538-1984

modonnell@riker.com

Counsel for Defendant
Dun & Bradstreet Holdings, Inc.

Dated: November 30, 2022